

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of:	)	
	)	
Revision of the Commission's Rules To	)	CC Docket No. 94-102
Ensure Compatibility with Enhanced 911	)	
Emergency Calling Systems	)	
	)	
Phase II Compliance Deadline for	)	
Non-Nationwide CMRS Carriers	)	
	)	
The NTELOS Companies Petition for	)	
Limited Waiver	)	
To: Wireless Telecommunications Bureau		

**STATUS REPORT  
OF THE NTELOS COMPANIES**

NTELOS Inc. on behalf of itself and its affiliates the Virginia PCS Alliance L.C.; Richmond 20 MHz LLC; and the West Virginia PCS Alliance L.C. (all doing business as, and hereinafter, "NTELOS") hereby respectfully submits this status report concerning progress NTELOS has made in reaching the Commission-mandated 95% penetration rate of location-capable handsets. As of October 25, 2006, NTELOS achieved the 95% location-capable objective. As of January 1, 2007, NTELOS had 95.63% of its customers using 911-capable handsets. As of April 1, 2007, NTELOS had 97.02% of its customers using 911-capable handsets. As of July 1, 2007, NTELOS had 97.47% of its customers using 911-capable handsets.

## **Background**

NTELOS is a Tier III regional wireless carrier that provides service primarily in Virginia and West Virginia to approximately 391,000 subscribers. NTELOS has implemented a handset-based location technology for the delivery of E911 Automatic Location Information (ALI) over its Code Division Multiple Access (CDMA) digital PCS network.

On October 21, 2005, NTELOS requested a limited waiver to extend the deadline in Section 20.18(g)(1)(v) of the Commission's rules. This section requires that Tier III carriers who have chosen to implement a handset-based solution to meet the location requirement for Enhanced 911 services achieve a location-capable handset penetration of 95% among subscribers by December 31, 2005.<sup>1</sup> In its Petition, NTELOS explained that certain circumstances existed that made it unlikely that NTELOS would meet the 95% subscriber penetration rate by the deadline, despite efforts to promote location-capable handsets to NTELOS' customers.

In an order released on January 27, 2006, the Commission granted NTELOS an extension of the penetration requirement until November 1, 2006. In the same order the Commission required NTELOS to file status reports on its progress every February 1, May 1, August 1, and November 1, beginning May 1, 2006. The following information is submitted in compliance with the January 27, 2006 Commission Order on the progress NTELOS has made toward the FCC-mandated 95% penetration requirement.

---

<sup>1</sup> 47. CFR §20.18 (g)(1)(v).

### **NTELOS Has Succeeded in Its Efforts to Encourage Customers to Upgrade to Location-Capable Handsets**

As of July 1, 2007, NTELOS had 97.47% of its customers using 911-capable handsets. NTELOS continues to strive to increase the number of customers to a GPS-capable handset beyond the 95% penetration requirement.

As reported in previous filings, NTELOS implemented a number of programs in order to meet the 95% handset penetration target:

1. Any NTELOS customer with a non-GPS handset qualifies for promotional handset pricing, irregardless of their contract status.
2. Promotional handset pricing is incorporated into all customer retention efforts and NTELOS' retention team encouraged customers with non-GPS capable handset models.
3. NTELOS offered location-capable handsets at very low prices, including a \$0.99 bar style handset, \$9.99 color flip handset and \$29.99 camera flip handset, for new or existing customers. These low prices make a handset upgrade affordable for all customers.
4. NTELOS continued its policy of refusing to activate any non-GPS capable handset that a customer, or potential customer, brought in and requested it to be activated. NTELOS no longer orders replacement parts or accessories for non-Global Positioning System (GPS) handsets and no longer repairs such handsets.

NTELOS also worked closely with the manufacturers of the handsets used by our customers in order to correct internal databases so that we had accurate reporting for location-capable handsets in service. Previously, when a customer would bring his or her own handset to a NTELOS store to be activated on our network, these handsets were designated in our databases merely as "customer provided" with no other identifying information. Using the electronic serial numbers (ESNs) for each of these handsets, NTELOS was able to identify the manufacturer of the set and then to request information from the manufacturer to determine if the handset was location capable. NTELOS

particularly appreciates the cooperation and assistance provided to us by numerous handset manufacturers that allowed us to accurately classify thousands of handsets. Indeed, only one manufacturer refused to cooperate with us and so all “customer provided” handsets from that manufacturer continue to be counted by NTELOS as “non-GPS”.

#### **The Number and Status of Phase II 911 Requests from PSAPs**

In total, NTELOS has received 911 Phase II requests from 125 Public Safety Answering Points (PSAPs). Of the 125 requests, 88 have been implemented, and 37 requests could not be implemented because NTELOS had no coverage in the area.

#### **The Dates on Which Phase II Has Been Implemented or Will Be Available**

Exhibit 1 illustrates the implementation date for each PSAP requesting Phase II deployment.

#### **The Status of NTELOS’ Coordination Efforts with PSAPs for Alternative 95% Handset Penetration Dates**

NTELOS has notified the PSAPs in NTELOS’ coverage area with Phase II 911 requests about the progress the company has made toward the 95% penetration rate. Email notification was sent to the PSAPs on July 26, 2007, about NTELOS’ current penetration rate and the completion of our goal of reaching 95%. A copy of this email is shown in Exhibit 2.

#### **Conclusion**

NTELOS takes its wireless 911 obligations very seriously. We have a demonstrated record of cooperation with PSAPs in the NTELOS service areas. Although

NTELOS is a relatively small carrier operating in a largely rural area, we made a significant effort in all parts of our organization which allowed us to meet 95% penetration requirement by the November 1, 2006, deadline set for us by the Commission. NTELOS continues its efforts to replace the remaining non-GPS telephones with new 911-capable models.

Pursuant to the FCC's order released on January 27, 2006, granting NTELOS an extension of the deadline, NTELOS will continue to report to the Commission on the status of the deployment of 911-capable handsets.

Respectfully submitted,

A handwritten signature in cursive script, reading "Mary McDermott", written over a horizontal line.

Mary McDermott  
Senior Vice President -  
Legal and Regulatory Affairs  
401 Spring Lane Plaza  
Waynesboro, VA 22980  
540-946-8677  
email: [mcdermottm@ntelos.com](mailto:mcdermottm@ntelos.com)

Dated: July 27, 2007

NTELOS Phase II Deployment

Exhibit 1

**VIRGINIA**

REQUESTOR	STATE	SERVICE REQUESTED	STATUS	DEPLOYED DATE
Albemarle County / Charlottesville	VA	Phase II	Phase II Deployed	3-Sep-03
Amherst County	VA	Phase II	Phase II Deployed	20-May-04
Appomattox County	VA	Phase II	Phase II Deployed	28-Mar-07
Augusta County	VA	Phase II	Phase II Deployed	15-Dec-04
Bedford	VA	Phase II	Phase II Deployed	7-Jan-04
Blacksburg Town (Montgomery County)	VA	Phase II	Phase II Deployed	5-Oct-04
Bland County	VA	Phase II	Phase II Deployed	17-Feb-05
Botetourt County	VA	Phase II	Phase II Deployed	1-Dec-03
Campbell County	VA	Phase II	Phase II Deployed	25-May-05
Caroline County	VA	Phase II	Phase II Deployed	15-Oct-04
Charles City County	VA	Phase II	No Cell Towers in County	No coverage
Chesapeake City	VA	Phase II	Phase II Deployed	3-Aug-03
Chesterfield County	VA	Phase II	Phase II Deployed	3-Aug-03
Christiansburg (Montgomery County)	VA	Phase II	Phase II Deployed	14-Oct-04
Clarke County	VA	Phase II	Phase II Deployed	5-Sep-03
Colonial Heights City	VA	Phase II	Phase II Deployed	10-Oct-06
Covington City	VA	Phase II	No coverage	No coverage
Danville City	VA	Phase II	Phase II Deployed	3-Nov-03
Dinwiddie County	VA	Phase II	Phase II Deployed	12-Aug-05
Essex County	VA	Phase II	No coverage	No coverage
Farmville	VA	Phase II	No coverage	No coverage
Fluvanna County	VA	Phase II	Phase II Deployed	26-May-04
Franklin City	VA	Phase II	Phase II Deployed	12-Apr-04
Franklin County	VA	Phase II	Phase II Deployed	2-Mar-04
Fredericksburg	VA	Phase II	Phase II Deployed	20-Aug-04
Giles County	VA	Phase II	Phase II Deployed	15-Sep-06
Gloucester County	VA	Phase II	Phase II Deployed	1-Jul-04
Greene County	VA	Phase II	Phase II Deployed	26-May-04
Greensville County	VA	Phase II	Phase II Deployed	7-Jan-05
Hampton City	VA	Phase II	Phase II Deployed	19-Aug-03
Hanover County	VA	Phase II	Phase II Deployed	30-Jun-04
Harrisonburg and Rockingham County	VA	Phase II	Phase II Deployed	3-Aug-03
Henrico County	VA	Phase II	Phase II Deployed	3-Aug-03
Hopewell City	VA	Phase II	Phase II Deployed	9-Jan-04
Isle of Wight County	VA	Phase II	Phase II Deployed	27-May-04
James City / County	VA	Phase II	Phase II Deployed	19-Aug-03
King and Queen	VA	Phase II	No coverage	No coverage
Lexington / Rockbridge County / Buena Vista	VA	Phase II	Phase II Deployed	24-Sep-03
Louisa County	VA	Phase II	Phase II Deployed	17-May-04
Lynchburg City	VA	Phase II	Phase II Deployed	5-Sep-03
Madison County	VA	Phase II	Phase II Deployed	23-Mar-05
Martinsville / Henry County	VA	Phase II	Phase II Deployed	3-Sep-03
Mathews	VA	Phase II	No coverage	No coverage
Montgomery County	VA	Phase II	Phase II Deployed	28-Jul-04
Nelson County	VA	Phase II	Phase II Deployed	19-Oct-06
New Kent County	VA	Phase II	Phase II Deployed	22-Jul-04
Newport News	VA	Phase II	Phase II Deployed	3-Aug-03
Norfolk City	VA	Phase II	Phase II Deployed	3-Aug-03
Orange	VA	Phase II	Phase II Deployed	3-Aug-03
Page County	VA	Phase II	Phase II Deployed	8-Mar-05
Petersburg City	VA	Phase II	Phase II Deployed	13-Oct-04
Pittsylvania County	VA	Phase II	Phase II Deployed	11-Sep-03
Portsmouth City	VA	Phase II	Phase II Deployed	3-Aug-03
Powhatan	VA	Phase II	Phase II Deployed	7-Jun-07
Prince George County	VA	Phase II	Phase II Deployed	20-Jun-06

# NTELOS Phase II Deployment

Pulaski County	VA	Phase II	Phase II Deployed	26-May-05
Radford City	VA	Phase II	Phase II Deployed	8-Dec-04
Rappahannock County	VA	Phase II	No coverage	No coverage
Richmond City	VA	Phase II	Phase II Deployed	3-Aug-03
Roanoke City	VA	Phase II	Phase II Deployed	3-Aug-03
Roanoke County	VA	Phase II	Phase II Deployed	17-Nov-05
Salem City	VA	Phase II	Phase II Deployed	3-Aug-03
Shenandoah County	VA	Phase II	Phase II Deployed	30-Sep-04
Spotsylvania County	VA	Phase II	Phase II Deployed	4-Oct-04
Staunton City	VA	Phase II	Phase II Deployed	14-Sep-06
Suffolk City	VA	Phase II	Phase II Deployed	3-Aug-03
Sussex County	VA	Phase II	Phase II Deployed	20-Oct-06
Virginia Beach City	VA	Phase II	Phase II Deployed	11-Sep-03
Warren County	VA	Phase II	Phase II Deployed	20-Sep-04
Waynesboro City	VA	Phase II	Phase II Deployed	1-Mar-05
West Point	VA	Phase II	No Towers in PSAP	No coverage
Williamsburg City	VA	Phase II	Phase II Deployed	22-Feb-05
Winchester	VA	Phase II	Phase II Deployed	1-Jan-04
Wythe County	VA	Phase II	Phase II Deployed	28-Apr-04
Wytheville	VA	Phase II	Phase II Deployed	9-Dec-04
York County	VA	Phase II	Phase II Deployed	4-Sep-03

## WEST VIRGINIA

REQUESTOR	STATE	SERVICE REQUESTED	STATUS	DEPLOYED DATE
Barbour County	WV	Phase II	No coverage	No coverage
Cabell County (Huntington)	WV	Phase II	Phase II Deployed	13-Feb-04
Doddridge County	WV	Phase II	Phase II Deployed	5-May-04
Gilmer County	WV	Phase II	No Towers in PSAP	No coverage
Harrison/Taylor Counties	WV	Phase II	Phase II Deployed	10-Jun-04
Jackson County	WV	Phase II	Phase II Deployed	14-Oct-05
Kanawha County (Charleston)	WV	Phase II	Phase II Deployed	11-Feb-04
Lewis County	WV	Phase II	Phase II Deployed	19-May-05
Marion County	WV	Phase II	Phase II Deployed	12-May-04
Mercer County	WV	Phase II	Phase II Deployed	3-Oct-03
Monongalia County (Morgantown)	WV	Phase II	Phase II Deployed	9-Apr-04
Raleigh County (Beckley)	WV	Phase II	Phase II Deployed	3-Oct-03
Randolph County	WV	Phase II	Phase II Deployed	12-Apr-07
Upshur County	WV	Phase II	Phase II Deployed	30-Nov-06
Wayne County	WV	Phase II	Phase II Deployed	7-Feb-05

## KENTUCKY

REQUESTOR	STATE	SERVICE REQUESTED	STATUS	DEPLOYED DATE
Boyd County (KY)	KY	Phase II	Phase II Deployed	3-Feb-04
Carter County (KY)	KY	Phase II	Phase II Deployed	9-Dec-05
Greenup County (KY)	KY	Phase II	Phase II Deployed-redeployed from KSP	29-Nov-06
Lawrence County (KY)	KY	Phase II	Phase II Deployed	26-May-05

## NORTH CAROLINA

REQUESTOR	STATE	SERVICE REQUESTED	STATUS	DEPLOYED DATE
Caswell County (NC)	NC	Phase II	Phase II Deployed	15-Mar-06
Dare County (NC)	NC	Phase II	Phase II Deployed	19-May-06
Currituck County (NC)	NC	Phase II	Phase II Deployed	12-May-06
Gates County (NC)	NC	Phase II	No coverage	No coverage
Granville County (NC)	NC	Phase II	No coverage	No coverage

**PENNSYLVANIA**

REQUESTOR	STATE	SERVICE REQUESTED	STATUS	DEPLOYED DATE
Bradford	PA	Phase II	No Coverage	No Coverage
Cambria	PA	Phase II	No Coverage	No Coverage
Columbia	PA	Phase II	No Coverage	No Coverage
Crawford	PA	Phase II	No Coverage	No Coverage
Cumberland	PA	Phase II	No Coverage	No Coverage
Fayette	PA	Phase II	No Coverage	No Coverage
Franklin	PA	Phase II	No Coverage	No Coverage
Fulton	PA	Phase II	No Coverage	No Coverage
Greene	PA	Phase II	No Coverage	No Coverage
Huntingdon	PA	Phase II	No Coverage	No Coverage
Indiana	PA	Phase II	No Coverage	No Coverage
Jefferson	PA	Phase II	No Coverage	No Coverage
Lackawanna	PA	Phase II	No Coverage	No Coverage
Lawrence	PA	Phase II	No Coverage	No Coverage
Lebanon	PA	Phase II	No Coverage	No Coverage
Lehigh	PA	Phase II	No Coverage	No Coverage
Luzerne	PA	Phase II	No Coverage	No Coverage
Mifflin	PA	Phase II	No Coverage	No Coverage
Montgomery	PA	Phase II	No Coverage	No Coverage
Montour	PA	Phase II	No Coverage	No Coverage
Perry	PA	Phase II	No Coverage	No Coverage
Somerset	PA	Phase II	No Coverage	No Coverage
Wayne	PA	Phase II	No Coverage	No Coverage
Westmoreland	PA	Phase II	No Coverage	No Coverage
York	PA	Phase II	No Coverage	No Coverage

**GRAND TOTALS****Virginia**

Total Requested	76
Total Deployed	68
Total Pending	0
Requests with no coverage	8

**West Virginia**

Total Requested	15
Total Deployed	13
Total Pending	0
Requests with no coverage	2

**Kentucky**

Total Requested	4
Total Deployed	4
Total Pending	0
Requests with no coverage	0

**North Carolina**

Total Requested	5
Total Deployed	3
Total Pending	0
Requests with no coverage	2

**Pennsylvania**

Total Requested	25
Total Deployed	0
Total Pending	0
Requests with no coverage	25



## NTELOS Phase II Deployment

### All States

Total Requested	125
Total Deployed	88
Total Pending	0
Requests with no coverage	37

**From:** Benson, Amber  
**Sent:** Thursday, July 26, 2007 9:46 AM  
**To:** Wayne County- Bill Willis; Berkeley County- Mary Kackley; Braxton County- Fred Thompson; Cabell County- Mike Davis; Clay County/Nicholas County- Joey Derito; Doddridge County/Ritchie County- Timothy Greenan; Gilmer County/Lewis County- Bill Rowan; Harrison County/Taylor County- Paul Bump; Jackson County- Bob Strobbe; Jerry Bennett; Kanawha County- Jim Sorgman; Marion County- Carolyn Ledsoe; Mercer County- Robert Hoge; Monongalia County- Ron Kyle; Raleigh County- Jack Bowden; Roane County- Melissa Bice; Upshur County- Cathy Collins; Rockingham Co/Harrisonburg- Jim Junkins; Accomack County/Northampton County- Scott Chandler; Albemarle County/Charlottesville- Tom Hanson; Alleghany County- Ryan Muterspaugh; Amelia County- Randy Leonard; Amherst County- John Boon; Appomattox County- Bobby Wingfield; Ashland City- Phil Heins; Augusta County- Donna Good; Bedford County/City- John Barrett; Blacksburg City- Bruce Bradbery; Bland County- Katie Gamble; Botetourt County- Spencer Suter; Bristol City- Milo Brunson; Brunswick County- Devon Clary; Buchanan County- Greg Clevinger; Buckingham County- Kevin Flippen; Campbell Co/Alta Vista Town- Aubrey Cheatham; Caroline County- Mike Hall; Carroll County/Galax City/Grayson County- Edward Hines; Charles City County- Thalia Bell; Charlotte County- Lisa Myers; Chesapeake City- Greg Staylor; Chesterfield County- Barbara Mayfield; Chincoteague Town- Eddie Lewis; Christiansburg City- Martha Cox; Clarke County- Pam Hess; Colonial Beach Town- David Eagal; Colonial Heights City- Lewis Archileti; Covington City- J.B. Broughman; Craig County- Larry Moore; Culpeper County- Steve Basnett; Cumberland County- Aaron Hickman; Danville City- Doug Young; Dickenson County- Mark Cvetnich; Dinwiddie County- Charles Lewis; Emporia City- T.C. Anderson; Essex County- Larry Smith; Farmville Town- Gilbert Wood; Fauquier County- Timothy McMenamin; Floyd County- Ford Wirt; Fluvanna County- Tammy Johnson; Franklin City- Mickey Futrell; Franklin County- Bill Agee; Frederick County- LeeAnna Pyles; Fredericksburg City- Lisa McMahon; Giles County- Melissa Parsons; Gloucester County- George Bains; Gloucester County- Heather Goin; Goochland County- Terry Pleasants; Greene County- George Buckley; Greensville County- Mike Veliky; Halifax County- Allen Bober; Hampton City- Susan Canny; Henrico County- Suzanne Roberts; Henry County/Martinsville- Wes Ashley; Highland County- Roberta Lambert; Hopewell City- Kim Parson; Isle of Wight County- Diane Jones; James City County- Carole Martin; King & Queen County- Holly McGowan; King George County- Wayne Bushrod; King William County- Loretta Collier; Lancaster County- Glenn Rowe; Lee County- Don Scott; Loudoun County- Mike Carter; Louisa County- Denise Marrs; Lunenburg County- D.J. Pendleton; Lynchburg City- Amy Lowe; Madison County- Robert Finks; Mathews County- Julie Kaylor; Mecklenburg County- Linda Cage; Middlesex County- Marcia Jones; Montgomery County- Bill Tolley; Nelson County- Susan Rorrer; New Kent County- Charles Gardner; Newport News City- Gwen Pointer; Norfolk City- Howard Douthit; Northumberland County- Kenny Eades; Norton City- Dot Abshire; Nottoway County- Gloria Gray; Orange County- Melissa McDaniel; Page County- Gene Stewart; Patrick County- Mickie Martin; Petersburg City- Sherwood Young; Pittsylvania County- Jim Davis; Poquoson City- Jack White; Portsmouth City- Timothy Stenger; Powhatan County- Floyd Greene; Prince Edward County- Johnathan Pickett; Prince George County- Denise Johnson; Pulaski County- John Spangler; Pulaski Town- Melissa Looney; Radford City- Gail Sojka; Rockbridge Co/Buena Vista/Lexington- Steven Reese; Scioto County- Greg Dunham; Gallia County- Stephen Wilson; Ironton/Lawrence County- Don Mootz; Ron Adams; Caswell County- Harvey Rudd; Currituck County- Liz Hodges; Dare County- Almey Gray; Richard Taylor; Lawrence County- Jeffrey Pack; Boyd County- Sandra Virgin; Carter County- Thomas Thompson; Greenup County- 911 center; Greenup County- Scott Brown; Ken Mitchell; Lawrence County- 911 center; York County- Terry Hall; Donna Brown; Dorothy Spears Dean; Pokey Harris; Rappahannock County- Richie Burke; Richmond City-William Smith; Richmond County- Chris Jett; Roanoke City- Mike Crockett; Roanoke County- Pat Shumate; Russell County- Bo Bise; Salem City- Valerie Ramey; Salem City- Vanessa Goad; Sam Keys; Scott County- Tim Addington; Shenandoah County- Gary Yew; Smyth County- Shannon Williams; Southampton County- Bill Gentry; Spotsylvania County- Lisa Usher; Stafford County- Linda Goodridge; Staunton City- Tom Byerly; Steve Marzolf; Suffolk City- J.J. Marx; Surry County- Harold Brown; Sussex County- Debbie Jones; Tazewell County- Brian Hale; Vinton Town- Craig Sheets; Virginia Beach City- Robert Nibarger; Warren County- Karen Cornwell; Washington County- Mary Fraysier; Waynesboro City- Gary Critzer; West Point Town- Kim Sirman; Westmoreland County- Norm Risavi; Williamsburg City- Susan Galvin; Winchester City- Erin Elrod; Wise County- Robert Sturgill; Wythe County- Ikey Davidson; Wytheville Town- Albert Newberry; York County- John Petersen

**Cc:** Sarbin, Anne  
**Subject:** NTELOS GPS Handset update as of 7/1/07

The purpose of this letter is to inform you about progress NTELOS has made toward having 95% of NTELOS customer handsets capable of sending Phase II wireless location information to Public Safety Answering Points (PSAPs). The Federal Communications Commission (FCC) had previously ruled that wireless providers needed to have 95% penetration of GPS capable handsets on their respective networks by December 31, 2005. NTELOS petitioned the FCC for an extension of this deadline and was granted an extension until November 1, 2006. NTELOS is required to inform the PSAPs of its progress towards reaching the goal of providing 95% of its customers with GPS capable handsets. As of July 1, 2007, 97.47% of the handsets on the NTELOS network are GPS capable. NTELOS is continuing in its efforts to encourage subscribers that currently do not have GPS capable handsets to convert to new handsets that are GPS capable. If you have questions about NTELOS' progress toward the GPS handset goal, please contact me at [bensona@ntelos.com](mailto:bensona@ntelos.com).

Thanks,

Amber Benson  
 NTELOS, Wireless E-911 Coordinator  
 1154 Shenandoah Village Dr, 2nd floor  
 Waynesboro, VA 22980  
 (540)946-8659 <desk> :: (540)942-3719 <fax> :: (540)241-3578 <PCS>